

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN WILCUTT,

Plaintiff,

CASE NUMBER:
12 CV 4322

-against-

ZIMMER, INC., ZIMMER HOLDINGS, INC.
and ZIMMER ORTHOPAEDIC SURGICAL
PRODUCTS, INC.,

Defendants.

**DECLARATION OF STEVEN GOODSTADT IN SUPPORT
OF PLAINTIFF'S MOTION TO STAY PENDING TRANSFER TO
MULTIDISTRICT PROCEEDING**

I, Steven Goodstadt, state as follows:

1. I am an attorney with the law firm of Napoli Bern Ripka Shkolnik & Associates, LLP, counsel of record for plaintiff, John Wilcutt, in the above entitled action. I have personal knowledge of the matters stated herein and could competently testify to them.

2. A true and accurate copy of the Transfer Order [Doc. No. 110] in *In Re: Zimmer NexGen Knee Implant Products Liability Litigation* (J.P.M.L. 2011) is attached as Exhibit A.

3. A true and accurate copy of the Notice of Potential Tag-Along Action [Doc. No 693] in *In Re: Zimmer NexGen Knee Implant Products Liability Litigation* (J.P.M.L. 2011) is attached as Exhibit B.

4. Counsel for plaintiff tried contacting defendants' counsel by telephone regarding this motion but were unable to reach him.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 21, 2012.


Steven Goodstadt